

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
LEADENHALL CAPITAL PARTNERS LLP :
and LEADENHALL LIFE INSURANCE :
LINKED INVESTMENTS FUND PLC, :
Case No.: 24 Civ. 3453 (JGK)
Plaintiffs, :
v. : **NOTICE OF MOTION**
: **OF THE 777 ENTITY**
JOSH WANDER, STEVEN PASKO, : **DEFENDANTS MOTION TO**
KENNETH KING, 777 PARTNERS LLC, : **DISMISS**
600 PARTNERS LLC, SPLCSS III LLC, :
SIGNAL SML 4 LLC, INSURETY AGENCY :
SERVICES LLC, DORCHESTER RECEIVABLES :
II LLC, SUTTONPARK CAPITAL LLC, SIGNAL :
MEDICAL RECEIVABLES LLC, INSURETY :
CAPITAL LLC, SUTTONPARK SERVICING :
LLC, SIGNAL SERVICING LLC, INSURETY :
SERVICING LLC, and ADVANTAGE CAPITAL :
HOLDINGS LLC, :
Defendants. :
-----X

PLEASE TAKE NOTICE that, upon the accompanying Declaration of Christopher J. O'Reilly, executed on August 9, 2024, with the exhibits annexed thereto, the accompanying Memorandum of Law and all prior pleadings and proceedings heretofore had herein, Defendants 777 Partners LLC, 600 Partners LLC, SPLCSS III LLC, Dorchester Receivables II LLC, Insurety Agency Services LLC, Signal SML 4 LLC, SuttonPark Capital LLC, Signal Medical Receivables LLC, Insurety Capital LLC, SuttonPark Servicing LLC, Signal Servicing LLC, and Insurety Servicing LLC (collectively, the "777 Entity Defendants"), by and through their attorneys, Smith, Gambrell & Russell, LLP, hereby move this Court, before the Honorable John G. Koeltl, United States District Judge, at the United States District Court for the Southern

District of New York, located at 500 Pearl Street, Courtroom 14A, New York, New York 10007, at a date and time to be directed by the Court, for an Order:

- (i) pursuant to Rules 12(b)(1) and (6) of the Federal Rules of Civil Procedure, dismissing the complaint of Plaintiffs Leadenhall Capital Partners LLP and Leadenhall Life Insurance Linked Investments Fund PLC; and
- (ii) granting such other and further relief as the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to the briefing schedule set by the Court on July 31, 2024 (ECF No. 151), opposition papers must be filed on or before September 27, 2024, and reply papers must be filed on or before October 18, 2024.

Dated: New York, New York
August 9, 2024

SMITH, GAMBRELL & RUSSELL, LLP

By: /s/John G. McCarthy
John G. McCarthy
David A. Pellegrino
Katie L. Schwartz
Ryan J. Solfaro

Attorneys for the 777 Entity Defendants

1301 Avenue of the Americas, 21st Floor
New York, New York 10019
Tel: (212) 907-9700
jmccarthy@sgrlaw.com
dpellegrino@sgrlaw.com
kschwartz@sgrlaw.com
rsolfaro@sgrlaw.com

To: Craig Carpenito
Leigh M. Nathanson
Brian Donovan
KING & SPALDING LLP
1185 Avenue of the Americas
New York, New York 10036
Tel: (212) 556-2100
ccarpenito@kslaw.com
lnathanson@kslaw.com
bdonovan@kslaw.com
Attorney for Plaintiffs